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8 Attorneys for Plaintiff
9 UNITED STATES OF AMERICA

10 UNITED STATES DISTRICT COURT

11 FOR THE CENTRAL DISTRICT OF CALIFORNIA

12 UNITED STATES OF AMERICA,

13 Plaintiff,

14 v.

15 YURI KHATCHIKYAN,
aka "Ghost," and
16 YELENA KARAPETYAN,

17 Defendants.

No. 2:24-cr-00214-MEMF

STIPULATION REGARDING REQUEST FOR
(1) CONTINUANCE OF TRIAL DATE AND
(2) FINDINGS OF EXCLUDABLE TIME
PERIODS PURSUANT TO SPEEDY TRIAL
ACT

CURRENT TRIAL DATE: January 13,
2025

CURRENT FSC DATE: January 3,
2025

PROPOSED TRIAL DATE: June 3,
2025

20
21 Plaintiff United States of America, by and through its counsel
22 of record, the United States Attorney for the Central District of
23 California and Assistant United States Attorney Joshua J. Lee, and
24 defendant YELENA KARAPETYAN ("defendant"), both individually and by
25 and through her counsel of record, Alex Kessel, hereby stipulate as
26 follows:

27 1. The Indictment in this case was filed on March 29, 2024.
28 Defendant first appeared before a judicial officer of the court in

1 which the charges in this case were pending on April 11, 2024. The
2 Speedy Trial Act, 18 U.S.C. § 3161, originally required that the
3 trial commence on or before June 20, 2024.

4 2. On April 11, 2024, the Court set a trial date of June 3,
5 2024, and a status conference date of April 25, 2024.

6 3. Defendant is released on bond pending trial. The parties
7 estimate that the trial in this matter will last approximately five
8 days.

9 4. The Court has previously continued the trial date in this
10 case from June 3, 2024, to January 13, 2025, and found the interim
11 period to be excluded in computing the time within which the trial
12 must commence, pursuant to the Speedy Trial Act.

13 5. By this stipulation, defendant moves to continue the trial
14 date to June 3, 2025, and seeks to vacate the final status conference
15 on January 3, 2025. This is the second request for a continuance.

16 6. Defendant requests the continuance based upon the following
17 facts, which the parties believe demonstrate good cause to support
18 the appropriate findings under the Speedy Trial Act:

19 a. Defendant is charged with violations of 18 U.S.C.
20 § 1349 (conspiracy to commit wire fraud); 18 U.S.C. § 1343 (wire
21 fraud); and 18 U.S.C. § 1957 (money laundering). The discovery
22 includes over 800 documents and 12,000 pages of discovery, including
23 bank records, tax records, phone records, and other business records,
24 as well as law enforcement reports, secretary of state documents,
25 loan-related documents, and a variety of other discovery.

26 b. Defense counsel is presently scheduled to be in the
27 following jury trials and hearings:
28

1 i. People v. Angel Hernandez, Case No.: FVI20000170;
2 Trial set for January 13, 2025; Location: Department V7 of the San
3 Bernardino County Superior Court, Victorville Courthouse; Date filed:
4 January 15, 2020; Charge(s): PC192(C)(1)-F, VC20001(B)(2)-F.

5 ii. USA v. Trisha Denise Meyer, Case No.: 5:22-cr-
6 00235; Sentencing set for March 3, 2025; Location: Central District
7 of California (Eastern Division, Riverside); District Judge:
8 Honorable Jesus G. Bernal; Date filed: September 15, 2022; Charge(s):
9 16 U.S.C. §§ 1538(a)(1)(E), 1540(b)(1), 16 U.S.C. §§ 1538(a)(1)(F),
10 1540(b)(1), 16 U.S.C. §§ 3372(a)(2)(C), 3373(d)(1)(B), 16 U.S.C. §§
11 3372(a)(1), 3373(d)(1)(B), 18 U.S.C. § 2(b).

12 iii. USA v. Reza Ehsan, Case No.: 2:19-cr-00090-1;
13 Trial set for April 22, 2025; Location: Central District of
14 California (Western Division, Los Angeles); District Judge: Honorable
15 George H. Wu; Date filed: February 15, 2019; Charge(s): 21 U.S.C. §§
16 841(a)(1), (b)(1)(C), (b)(1)(E), and (b)(2), 31 U.S.C. § 5324(a)(3),
17 18 U.S.C. § 2(b).

18 iv. People v. Kevin Yohannes, Case No.: 24CJCF03553;
19 Trial set for February 13, 2025; Location: Department 118 of the Los
20 Angeles County Superior Court, Clara Shortridge Foltz Courthouse;
21 Date filed: June 5, 2024; Charge(s): PC187(a)-F, PC12022.5(a).

22 v. People v. Vardan Dzhandzhikyan, Case No.:
23 LA098018; Trial set for January 15, 2025; Location: Department G of
24 the Los Angeles County Superior Court, Van Nuys Courthouse; Judge:
25 Honorable Richard H. Kirschner; Date filed: August 3, 2023;
26 Charge(s): PC 187(A), PC 664/187(A), PC 245(A)(2).

27 vi. People v. John Martinez, Case No.: KA130449;
28 Trial set for January 27, 2025; Location: Department M of the Los

1 Angeles County Superior Court, Pomona Courthouse; Date filed: October
2 19, 2022; Charge(s): PC 187(A), PC29800(a)(1)-F, HS11370.1(a)-F,
3 PC30305(a)(1)-F.

4 vii. USA v. Gabrielle Alvarado, Case No.: 4:22-cr-340-
5 01; Sentencing set for December 19, 2024; Location: Eastern District
6 of Arkansas (Central Division); District Judge: Honorable Brian S.
7 Miller; Date filed: December 7, 2022; Charge(s): 21 U.S.C. §§ 846,
8 841(a)(1) and 841(b)(1)(B).

9 viii. People v. Daed Andrade, Case No.: KA124630;
10 Trial set for January 22, 2025; Location: Department M of the Los
11 Angeles County Superior Court, Pomona Courthouse; Date filed: May 14,
12 2020; Charge(s): PC187(a)-F, PC664-187(a)-F, PC664-187(a)-F.

13 c. In light of the foregoing, counsel for defendant also
14 represents that additional time is necessary to confer with
15 defendant, conduct and complete an independent investigation of the
16 case, conduct and complete additional legal research including for
17 potential pre-trial motions, review the discovery and potential
18 evidence in the case, and prepare for trial in the event that a
19 pretrial resolution does not occur. Defense counsel represents that
20 failure to grant the continuance would deny him reasonable time
21 necessary for effective preparation, taking into account the exercise
22 of due diligence.

23 d. Defendant believes that failure to grant the
24 continuance will deny her continuity of counsel and adequate
25 representation.

26 e. The government does not object to the continuance.

27 f. The requested continuance is not based on congestion
28 of the Court's calendar, lack of diligent preparation on the part of

1 the attorney for the government or the defense, or failure on the
2 part of the attorney for the Government to obtain available
3 witnesses.

4 7. For purposes of computing the date under the Speedy Trial
5 Act by which defendant's trial must commence, the parties agree that
6 the time period of January 13, 2025, to June 3, 2025, inclusive,
7 should be excluded pursuant to 18 U.S.C. §§ 3161(h)(7)(A),
8 (h)(7)(B)(i), and (h)(7)(B)(iv) because the delay results from a
9 continuance granted by the Court at defendant's request, without
10 government objection, on the basis of the Court's finding that: (i)
11 the ends of justice served by the continuance outweigh the best
12 interest of the public and defendant in a speedy trial; (ii) failure
13 to grant the continuance would be likely to make a continuation of
14 the proceeding impossible, or result in a miscarriage of justice; and
15 (iii) failure to grant the continuance would unreasonably deny
16 defendant continuity of counsel and would deny defense counsel the
17 reasonable time necessary for effective preparation, taking into
18 account the exercise of due diligence.

19 8. Nothing in this stipulation shall preclude a finding that
20 other provisions of the Speedy Trial Act dictate that additional time
21 periods be excluded from the period within which trial must commence.

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1 Moreover, the same provisions and/or other provisions of the Speedy
2 Trial Act may in the future authorize the exclusion of additional
3 time periods from the period within which trial must commence.

4 IT IS SO STIPULATED.

5 Dated: December 10, 2024

Respectfully submitted,

6 E. MARTIN ESTRADA
United States Attorney

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8 LINDSEY GREER DOTSON
Assistant United States Attorney
Chief, Criminal Division

9
10 /s/ Joshua J. Lee
JOSHUA J. LEE
11 Assistant United States Attorney

12 Attorneys for Plaintiff
13 UNITED STATES OF AMERICA
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1 I am YELENA KARAPETYAN's attorney. I have carefully discussed
2 every part of this stipulation and the continuance of the trial date
3 with my client. I have fully informed my client of her Speedy Trial
4 rights. To my knowledge, my client understands those rights and
5 agrees to waive them. I believe that my client's decision to give up
6 the right to be brought to trial earlier than June 3, 2025, is an
7 informed and voluntary one.

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9 
ALEX KESSEL
Attorney for Defendant
YELENA KARAPETYAN

12-9-24
Date

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13 I have read this stipulation and have carefully discussed it
14 with my attorney. I understand my Speedy Trial rights. I
15 voluntarily agree to the continuance of the trial date and give up my
16 right to be brought to trial earlier than June 3, 2025. I understand
17 that I will be ordered to appear in Courtroom 8B of the Federal
18 Courthouse, 350 West First Street, Los Angeles, California on June 3,
19 2025, at 8:30 a.m.

20 
21 YELENA KARAPETYAN
22 Defendant

12-9-2024
Date